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11 Attorneys for Defendant
EXPERIAN INFORMATION SOLUTIONS, INC.

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

16 ROANE HOLMAN, and all others similarly
situated,

17 Plaintiffs,

18 v.

19 EXPERIAN INFORMATION SOLUTIONS,
20 INC.,

21 Defendant.

Case No. CV-11-00180-CW

Assigned to the Honorable
Claudia Wilken

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND BRIEFING
SCHEDULE FOR PLAINTIFF'S
MOTION FOR CLASS
CERTIFICATION**

1 Pursuant to Local Rules 1-4 and 1-5 and the commentary to Local Rule 7-2, Defendant
2 Experian Information Solutions, Inc. (“Experian”), and Plaintiff Roane Holman (“Plaintiff” and,
3 together with Experian, the “Parties”) jointly submit this Stipulation to Extend Briefing Schedule
4 for Plaintiff’s Motion for Class Certification.

5 WHEREAS, Plaintiff filed a Motion for Leave to File His First Amended Complaint on
6 September 15, 2011;

7 WHEREAS, Plaintiff’s proposed First Amended Complaint seeks to add two named
8 Plaintiffs;

9 WHEREAS, the Hearing on Plaintiff’s Motion for Leave to File His First Amended
10 Complaint is set for October 20, 2011;

11 WHEREAS, under the current schedule, Plaintiff’s Motion for Class Certification must be
12 filed by October 13, 2011, Experian’s Opposition to Plaintiff’s Motion for Class Certification
13 must be filed by October 27, 2011, and Plaintiff’s Reply must be filed by November 3, 2011;

14 WHEREAS, the Hearing on Plaintiff’s Motion for Class Certification is scheduled for
15 November 17, 2011;

16 WHEREAS, under the current schedule, Plaintiff will be unable to seek appointment of
17 the two newly proposed named plaintiffs as class representatives in its Motion for Class
18 Certification because the Motion for Class Certification must be filed before the Court will rule
19 on Plaintiff’s Motion for Leave to File His First Amended Complaint;

20 WHEREAS, should the Court grant Plaintiff’s Motion for Leave to File His First
21 Amended Complaint on October 20, 2011, Experian will not have sufficient time to conduct the
22 discovery necessary into the two newly proposed named plaintiffs to oppose Plaintiff’s Motion
23 for Class certification by October 27, 2011;

24 WHEREAS, Plaintiff entered into a settlement agreement with Finex Group LLC on
25 August 26, 2011 and, unless the current schedule is modified, Experian will not have sufficient
26 time to conduct discovery into this settlement before filing its Opposition to Plaintiff’s Motion for
27 Class Certification;

28 NOW, THEREFORE, IT IS HEREBY STIPULATED by the Parties, through their

1 respective counsel of record, that:

2 (1) Plaintiff be permitted to file his First Amended Complaint;

3 (2) The briefing schedule for Plaintiff's Motion for Class Certification will be as
4 follows: (i) Plaintiff must file his Motion for Class Certification by December 1, 2011; (ii)
5 Experian must file its Opposition to Plaintiff's Motion within 28 days, i.e., not later than
6 December 29, 2011; (iii) Plaintiff must file his Reply within 14 days of Experian's Opposition,
7 i.e., not later than January 12, 2012; and (iv) the Hearing on Plaintiff's Motion for Class
8 Certification will occur on January 26, 2012.

9 Dated: October 4, 2011

Jones Day

11 By: /s/ Michael G. Morgan
12 Michael G. Morgan

13 Attorneys for Defendant
14 EXPERIAN INFORMATION SOLUTIONS,
INC.

15 Dated: October 4, 2011


Anderson, Ogilvie & Brewer LLP

17 By: /s/ Mark Anderson
18 Mark Anderson

19 Attorneys for Plaintiff
20 ROANE HOLMAN

21 Pursuant to this stipulation, IT IS SO ORDERED.

22
23
24 Dated: 10/5/2011


25 The Hon. Claudia Wilken
26 District Judge of the Northern District of
27 California

28 LAI-3150256